

BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2021-1-E

IN THE MATTER OF:)	
)	
Annual Review of Base Rates)	PETITION TO INTERVENE
for Fuel Costs of Duke Energy)	BY NUCOR STEEL –
Progress, LLC)	SOUTH CAROLINA
)	

Nucor Steel-South Carolina ("Nucor"), a Division of Nucor Corporation, pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), hereby respectfully petitions to intervene in the above-captioned docket. Nucor states the following grounds in support of this petition:

1. Nucor owns and operates a steel production facility near Darlington, South Carolina. As a retail customer of Duke Energy Progress, LLC ("DEP") (formerly known as Progress Energy ("Progress Energy") and Carolina Power & Light Company ("CP&L")), Nucor purchases hundreds of millions of kWh of electricity annually at a cost of millions of dollars per year. Since the cost of electricity comprises one of the major costs of Nucor's manufacturing process, electric costs directly affect Nucor's ability to continue to produce steel at a competitive price.
2. This docket has been established to review DEP's historical and projected fuel costs and to determine the appropriate fuel factor for the next twelve months. Nucor has a stake in, and will be directly and substantially affected by, the outcome of this proceeding. Due to the magnitude of its load and its unique service characteristics, Nucor cannot be adequately represented by any other party to this proceeding. At this early stage in the proceeding, Nucor has not fully determined what position it may take and how long it will take to complete its presentation and any cross-examination during the public hearing established in this proceeding. Since 1987, Nucor has actively participated

in many previous DEP, Progress Energy and CP&L fuel and rate proceedings before this Commission.


3. Nucor's mailing address is:

Nucor Steel – South Carolina
P.O. Box 525
Darlington, SC 29532

4. Nucor will be jointly represented in this proceeding by the firms of Stone Mattheis Xenopoulos & Brew, PC (formerly Brickfield, Burchette, Ritts & Stone, PC) and Moore & Van Allen, PLLC. Stone Mattheis Xenopoulos & Brew, PC represents Nucor in matters regarding electric rates and service in jurisdictions throughout the United States. In the past, attorneys of the firm have appeared before this Commission, the Federal Energy Regulatory Commission, and many other state utility commissions. In accordance with Rule 103-804 T(1)(b) of the Commission's Rules of Practice and Procedure, for the purposes of this proceeding, Stone Mattheis Xenopoulos & Brew, PC is associated with the firm of Moore & Van Allen, PLLC, whose attorneys are licensed to practice in South Carolina. Service and correspondence regarding this proceeding should be sent to both the undersigned firms.

WHEREFORE, for the reasons set forth above, Nucor respectfully requests permission to intervene in this proceeding.

Respectfully submitted,


MOORE & VAN ALLEN, PLLC

Robert R. Smith II

100 North Tryon Street
Suite 4700
Charlotte, North Carolina 28202
(704) 331-1000
(704) 339-5870 (fax)
robsmith@mvalaw.com

STONE MATTHEIS XENOPOULOS & BREW, PC

Michael K. Lavanga

1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007
(202) 342-0800
(202) 342-0807 (Fax)
mkl@smxblaw.com

Counsel for Nucor Steel – South Carolina

Dated: March , 2021

BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2021-1-E

IN THE MATTER OF:

Annual Review of Base Rates
for Fuel Costs of Duke Energy
Progress, LLC

**PETITION TO INTERVENE
BY NUCOR STEEL –
SOUTH CAROLINA**

This is to certify that the foregoing document was served upon the following

parties at the addresses set forth by first-class mail or electronic mail, on this the

day of March, 2021:

Andrew M. Bateman, Esq.
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
abateman@ors.sc.gov

Heather Shirley Smith, Esq.
Duke Energy Progress, LLC
40 W. Broad Street, Suite 690
Greenville, SC 29601
Heather.smith@duke-energy.com

Rebecca J. Dulin, Esq.
Duke Energy Progress, LLC
1201 Main Street, Suite 1180
Columbia, SC 29201
Rebecca.Dulin@duke-energy.com

Roger P. Hall
South Carolina Department of
Consumer Affairs
Post Office Box 5757
Columbia, SC 29250
rhall@scconsumer.gov

Alexander W. Knowles, Esq.
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
aknowles@ors.sc.gov

Katie M. Brown, Esq.
Duke Energy Progress, LLC
401 West Broad Street, Suite 690
Greenville, SC 29601
katie.brown2@duke-energy.com

Samuel J. Wellborn, Esq.
Robinson Gray Stepp & Laffitte, LLC
1310 Gadsden Street
Columbia, SC 29201
swellborn@robinsongray.com

Carri Grube Lybarker, Esq.
South Carolina Department of
Consumer Affairs
clybarker@scconsumer.gov

Robert R. Smith, II